

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

EVERETTE CADDEN,

Plaintiff,

v.

Civil Action No.: 1:22-CV-00347

UNITED STATES OF AMERICA,

Defendant.

**PLAINTIFF'S RULE 26(a)(3) PRETRIAL DISCLOSURES
AND PRETRIAL LIST OF WITNESSES AND EXHIBITS**

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(A) and the Court's Scheduling Order, Plaintiff Everette Cadden, by counsel, hereby submits his Pretrial Disclosures and Pretrial List of Witnesses and Exhibits:

I. Witnesses

A. Plaintiff sets forth the following witnesses who he expects to call to testify at the trial of this matter:

1. Everette Cadden
14061 Big Crest Lane, #403
Woodbridge, VA 22191
2. Sabrina Green
2263 York Drive, Apt 113
Woodbridge, VA 22191
3. Michael Todd, DO
Virginia Commonwealth University Health Systems
Richmond, VA
4. Dean M. DeLuke, DDS
Virginia Commonwealth University Health Systems
Richmond, VA

5. Ann M. Sagalyn, DMD
Avon Village Family Dentistry
32 East Main Street
Avon, CT 06001
Dr. Sagalyn will testify through deposition testimony.
6. Garry Myers, DDS
Virginia Commonwealth University Health Systems
Richmond, VA
7. Salar Sanjari, DDS
Fairfax Endodontics
Fairfax, VA
8. James Houseworth, DDS
Prince William Community Health Center
Manassas, VA
9. Ian Lam, DDS
Prince William Community Health Center
Manassas, VA
10. Porscha Kinlaw, DDS
Prince William Community Health Center
Manassas, VA
11. Amparo Pinzon-Avellandeda, DDS
Prince William Community Health Center
Manassas, VA

B. Plaintiff further states that he may call the following additional witnesses to testify at the trial of this matter if the need arises:

1. Sharita Minor
7612 Curtis Lane
Spotsylvania, VA 22551
2. Laurissa Venable
7807 Shadowood Court, Apt. A
Henrico, VA 23228
3. Cynthia David
32 Smithfield Way
Fredericksburg, VA 22406

4. Plaintiff's prior and current medical providers, who are identified in Plaintiff's medical records, including but not limited to:

Stephen Woof, PA-C
Multispecialty Health Group
330411SMS Spotsylvania Multi Spe
4604 Sotsylvania Parkway, Suite 200
Fredericksburg, VA 22408-7763

VCU School of Dentistry
520 North 12th Street
Box 980566
Richmond, VA 23298

Sentara Northern Virginia Medical Center
2300 Opitz Blvd
Woodbridge, VA 22191-3311

Dale Pesolyar, M.D.
Mary Washington Hospital
1201B Sam Perry Blvd, Suite 210
Fredericksburg, VA 22401

Singh Sahni, M.D.
Neurosurgical Associates, PC
1651 N Parham Road
Richmond, VA 23229

Chetan Bettegowda, M.D
Johns Hopkins Medicine
1800 Orleans Street
Baltimore, MD 21287-0010

VCU Medical Center
Andrew W. Chapman, M.D.
Pain Management
Tammy Redman
1250 E Marshall Street
Richmond, VA 23298-0510

Kyung Cheon Min, DDS
Impact Dental Care
315 Garrisonville Road, Unit 105B
Stafford, VA 22554

Damon Omar Watson, D.D.S., MD
Virginia Oral & Facial Surgery
6031 Harbour Park Drive
Midlothian, VA 23112

Ivica Ducic, M.D.
Washington Nerve Institute
7601 Lewinsville Road, Suite 460
McLean, VA 22102-2834

5. Any records custodians offered to authenticate documents offered into evidence.
6. Any witness identified by Defendant.
7. Any witness offered to rebut evidence offered by Defendant.
8. Any witness offered to impeach a witness called by Defendant.

II. Exhibits.

A. Plaintiff sets forth the following exhibits that he expects to offer at the trial of this matter:

1. Plaintiff's Medical Specials Index with Medical Bills
2. Plaintiff's Medical Records
 - Prince William Community Health Center
DOS: 6/18/18-10/26/2020
 - Stephen Woof, PA-C
Multispecialty Health Group
DOS: 3/12/2020, 10/6/2020, 6/30/2021
 - VCU School of Dentistry
DOS: 6/22/2020, 7/7/2020, 7/9/2020, 9/2/2020, 9/30/2020, 11/4/2020
 - Sentara Northern Virginia Medical Center
DOS: 8/14/2020, 9/28/2020, 2/4/2021, 3/4/2021

- Dale Pcsolyar, M.D. (Neurology)
Mary Washington Hospital
DOS: 11/23/2020
 - Singh Sahni, M.D.
Neurosurgical Associates, PC
DOS: 4/1/2021
 - Chetan Bettegowda, M.D.
DOS: 5/7/2021
 - VCU Medical Center
Andrew W. Chapman, M.D. (Neurosurgery/Neurology)
DOS: 6/9/2021, 7/29/2021, 7/30/2021, 8/26/2021, 9/16/2021, 12/2/2021,
3/3/2022
 - VCU Medical Center
Pain Management
DOS: 6/9/202, 10/20/2021
 - VCU Medical Center
Tammy Redman (Psychiatry)
DOS: 4/12/2022
 - Kyung Cheon Min, DDS
Impact Dental Care
DOS: 10/12/2021
 - Damon Omar Watson, D.D.S., MD
Virginia Oral & Facial Surgery
DOS:12/9/2021
 - Ivica Ducic, M.D.
Washington Nerve Institute
DOS: 12/29/2021
 - Hasnain Shinwari, D.D.S.
Oral & Facial Surgery Center of Virginia
DOS: 11/19/2019-11/23/2020
 - CVS Pharmacy Records
3. Plaintiff's Form 95 Submission
4. Radiological Films
- Prince William Community Health Center
46 Images (X98682_1 – X98682_46)

- Medical Imaging Lee's Hill
3 Diagnostic Studies
 - Sentara Healthcare
7 Images (DOS: 11/15/20, 02/04/21, 02/05/21)
 - Sentara Northern Virginia Medical Center
7 Images (DOS: 11/15/20, 02/04/21, 02/05/21)
 - VCU Dental Care
5 Studies (DOS: 06/22/20, 07/07/20, 07/09/20, 09/02/20, 09/30/20)
5. Exemplar ProGlider WaveOne instrument
 6. Excerpts of Defendant's Answers and Responses to Plaintiff's Interrogatories

B. Plaintiff sets forth the following exhibits that he may introduce at the trial of this matter if the need arises:

1. Any exhibit produced after the date of this document.
2. Any exhibit identified or offered by Defendant.
3. Any exhibit offered to rebut evidence offered by Defendant.
4. Any exhibit offered to impeach a witness called by Defendant.

Respectfully submitted,

EVERETTE CADDEN

By: /s/ Malcolm P. McConnell, III
Of Counsel

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